

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$45,908 IN U.S. CURRENCY,

Defendant,

and

DANDRE BROWN,

Claimant.

Case No. 22-mc-42 (\_\_\_/\_\_\_)

**STIPULATION TO EXTEND  
TIME TO COMMENCE  
JUDICIAL FORFEITURE  
PROCEEDINGS**

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until August 18, 2022.

1. On or about February 03, 2022, the Minneapolis/St. Paul International Airport Police (“APD”) and members of the United States Drug Enforcement Administration (“DEA”) seized \$45,908 in U.S. Currency from the Claimant.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On April 19, 2022, Dandre Brown filed a claim for the Defendant Currency through his attorney, Brian Y. Silber.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

*[continued on next page]*

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until August 18, 2022 in order to allow time for settlement discussions.

Dated: 07/13/2022

ANDREW M. LUGER  
United States Attorney

*s/Craig Baune*

BY: CRAIG BAUNE  
Assistant U.S. Attorney  
Attorney ID No. 331727  
600 United States Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
Phone: 612-664-5600  
Craig.baune@usdoj.gov

Date: 07/13/2022

LAW OFFICES OF BRIAN Y SILBER  
P.A.

*s/Brian Y. Silber*

BRIAN Y. SILBER, Esq.  
Florida Attorney No. 640646  
916 S. Andrews Ave.  
Ft. Lauderdale, FL 33316  
954-462-3636

Attorney for Claimant  
Dandre Brown